

REMARKS

The present application contains claims 1, 4-10, 25-30, 32, 34, 36-38 and 72-82.

The claims all stand rejected under 35 USC 103(a) as being unpatentable over Wilkinson (US 4,955,205) in view of Forkosh (US 6,494,053) further in view of Saito (US 3,266,784) and further in view of Handel (US 5,988,843).

Applicants respectfully disagree and submit that the Examiner has not provided a *prima facie* case of obviousness since the suggested combination does not result in or even suggest the claimed invention.

Claims 25 and 26 are the only independent claims in the application. Claim 25 recites "wherein the air to be dried moves through the dehumidifying section, and said motion of the air to be dried causes or contributes to causing at least one of the at least one dehumidifying section elements to move." Claim 26 recites "wherein air moves through the regenerating section and said motion of the air causes or contributes to causing at least one of the at least one regenerating section elements to move." Thus, both independent claims recite that the motion of the air causes or contributes to causing at least one of the at least one dehumidifying or regenerating section elements to move. None of the cited art teaches or suggests the section elements to be moved or driven by air.

The Examiner rejects the claims in the present application in view of the combined system of Wilkinson, Forkosh, Saito and Handel. According to the Examiner it would have been obvious to take the dehumidifier taught by Wilkinson, combined with the steady state operation of the dehumidifier and regenerator of Forkosh and further incorporating a rotary drum and buckets with the system's absorbent tower, as taught by Saito.

The Examiner states in the office action that Wilkinson, Forkosh and Saito do not explicitly teach the air to be dried causes at least one of the dehumidifying section elements to move. Handel teaches a dehumidifier with an air flap moveable by the flow of the air (see Fig. 1 and col. 3, lines 1-11). According to the Examiner it would have been obvious to one of ordinary skill in the art at the time of the invention to place the flaps as taught by Handel in the system as taught by Wilkinson, Forkosh and Saito in order to change the flow and direction of air depending on the air volume and speed going through the dehumidifying section.

Applicants respectfully disagree that this combination makes the claimed invention obvious. Even agreeing *arguendo* that it would have been obvious to combine Wilkinson,

Forkosh and Saito, the result would be a system where the buckets are moved by an electric motor. See Saito, col. 3, lines 7-15 and element 14 in Fig. 1. It is not clear to applicants where the Examiner suggests adding the air flap of Handel to the combined system of Wilkinson, Forkosh and Saito. Applicants submit that adding such air flaps would be against the primary principle of the combined system which is dehumidifying air.

The Examiner suggests adding the air flap of Handel to the combined system in order to *change the flow and direction of air*. Applicants submit that changing the direction of air is irrelevant to the claimed invention or to the combined system of Wilkinson, Forkosh and Saito.

In Saito, the air inserts at inlets 16 and 18 which are at the top of the tower. The air flows from the inlet to the liquid reservoirs, where the buckets are positioned, see Fig. 1. Thus, it is neither needed nor desired to change the direction of the air flow in Saito, or in the combined system.

The air flaps of Handel are positioned so as to change the direction of the air flow to be opposite to the natural direction, see col. 3, lines 7-11 of Handel. It would be against common sense to insert an air flap as taught by Handel to the combined system, since that would change the direction of the air flow and would result in a system where the air does not flow in the direction of the liquid reservoirs and would lose the system's function of dehumidifying air.

In addition, even assuming *arguendo* that one would add such air flaps, this would *not* result in the claimed invention which requires that the *buckets* (of Saito) be moved by the air interacting with the system. No combination of references or teachings of references would result in a motion of air that causes or contributes to causing at least one of the at least one dehumidifying or regenerating section elements to move. The only methodology in the prior art that is disclosed is using a motor.

Most importantly, any air flap that would be added to the combined system, would not impact on the movement of the buckets of Saito. These buckets, as explicitly disclosed by Saito, are moved by an electric motor. The air inserts at inlets 16 and 18 positioned at the top of the tower, which is substantially distant from the liquid reservoirs. The electric motor is directly linked to the elements that move the buckets. Accordingly, the movement of the air would have no impact on the movement of the buckets.

Thus, as Saito uses an electric motor to move the buckets, applicants submit that a person of ordinary skill in the art would not find it obvious to move the buckets using the air being treated, even if there were some motivation to add an air flap as taught by Handel.

Applicants further reiterate that changing the direction of the air flow, as taught by Handel, is just irrelevant to the movement of the buckets and is against the principle of the combined system of Wilkinson, Forkosh and Saito since it would prevent dehumidification of the air.

In view of the above arguments it is submitted that the claims are patentable over the cited art. A notice thereof is respectfully awaited.

Respectfully submitted,



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Enclosures:

- Petition for Extension (One Month)